

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Troy Cochran  
Tyra Cochran

Debtor(s)

Nationstar Mortgage LLC vs.

Respondent

CHAPTER 13

CASE NO. 16-12987 MDC

**RESPONSE OF NATIONSTAR MORTGAGE LLC TO DEBTOR'S MOTION TO  
RECONSIDER ORDER MODIFYING THE AUTOMATIC STAY**

Respondent, Nationstar Mortgage LLC, by and through its counsel, KML Law Group, P.C. , hereby responds to the Debtor's Motion to Reconsider Order Modifying the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtor made partial payments in the amount of \$822.90 in or about September 2019, October 2019, December 2019, January 2020, and February 2020. Pursuant to the Notice of Payment Change filed on or about July 29, 2019, the monthly mortgage payment changed to \$831.68 as of September 1, 2019.
6. Admitted.
7. Admitted.
8. Denied. Respondent is without specific information to admit or deny. Strict proof is demanded at time of trial.
9. Denied. Respondent is without specific information to admit or deny. Strict proof is demanded at time of trial. As referenced in Debtors' instant Motion, Debtors and Respondent previously entered into a stipulation to resolve prior post-petition mortgage delinquencies. Pursuant to the terms of the stipulation, when Debtors thereafter failed to make ongoing, regular post-petition payments, Respondent sent Debtors and Debtors' counsel a Notice of Default on January 21, 2020 and provided a deadline to cure of February 5, 2020. Debtors failed to cure the arrears, and, pursuant to the stipulation,

Respondent filed a Certification of Default. The agreed-upon stipulation provides that if Movant files a Certification of Default, “the Court **shall** enter an Order granting Movant immediate relief from the automatic stay.” Nothing in Debtors’ Motion to Reconsider provides information to the contrary. Further, as of April 13, 2020 Debtors are still owing for January 2020 through April 2020 payments of \$831.68, less a suspense balance of \$787.78, for a total delinquent amount of \$2,538.94.

WHEREFORE, Respondent respectfully requests that Debtors’ Motion to Reconsider the Order Modifying the Automatic Stay be denied.

**/s/ Rebecca A. Solarz, Esquire**

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Date: April 14, 2020